

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SEALED PLAINTIFF 1)	
)	
and)	
)	
SEALED PLAINTIFF 2,)	
)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:22-cv-00670-MHL
)	
PATRIOT FRONT, <i>et al.</i>,)	
)	
Defendants.)	

REQUEST FOR CLERK’S ENTRY OF DEFAULT AGAINST WILLIAM RING

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiffs, by counsel, respectfully request that the Clerk of the Court enter default against Defendant William Ring (“Defendant” or “Ring”) based on his failure to answer, plead, or otherwise defend in this civil action. In support of this request, Plaintiffs state as follows:

1. Plaintiffs filed their Complaint against Defendant on October 18, 2022 (ECF No. 1). On December 5, 2022, Plaintiffs filed an Amended Complaint against Defendant (ECF No. 31).
2. The Clerk of the Court issued a summons as to Defendant on January 4, 2023 (ECF No. 49).
3. On January 12, 2023, Plaintiffs filed the executed summons confirming that Ring was served on January 9, 2023 through personal service on Lt. Mattie at the Fayette County Prison at 12 Court Street, Uniontown, Pennsylvania (ECF No. 54). Ring was an inmate at the Fayette

County Prison at that time (*see* accompanying Shebelskie Decl. ¶ 6), and Lt. Mattie confirmed that she is an agent authorized by appointment to receive service at that address (ECF No. 54).

4. In accordance with Federal Rule of Civil Procedure 12(a)(1)(A), Defendant's answer or other response was due no later than January 30, 2023. No such answer or other response has been filed or served (*see* accompanying Shebelskie Decl. ¶ 7).

For the reasons set forth above, Plaintiffs respectfully request that the Clerk of the Court enter default against Defendant William Ring as to all claims asserted by Plaintiffs.

Date: July 24, 2023

Respectfully submitted,
SEALED PLAINTIFFS 1 and 2

By: /s/ Michael R. Shebelskie

Michael R. Shebelskie
VSB No. 27459
Kevin S. Elliker
VSB No. 87498
HUNTON ANDREWS KURTH LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219-4074
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
mshebelskie@HuntonAK.com
kelliker@HuntonAK.com

Edward G. Caspar (admitted pro hac vice)
DC Bar No. 1644168
Arthur Ago (admitted pro hac vice)
DC Bar No. 463681
LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW
1500 K Street, NW, Suite 900
Washington, DC 20005
Telephone: (202) 662-8600
Facsimile: (202) 783-0857
ecaspar@lawyerscommittee.org
aago@lawyerscommittee.org

Daniel J. Kramer (admitted pro hac vice)
NY Bar No. 1979392
Joshua Hill (admitted pro hac vice)
NY Bar No. 4297826
Gregory F. Laufer (admitted pro hac vice)
NY Bar No. 4614764
Robert J. O'Loughlin (admitted pro hac vice)
NY Bar No. 5225966
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019-6064
Telephone: (212) 373-3000
Facsimile: (212) 492-0441
dkramer@paulweiss.com
jhill@paulweiss.com
glaufer@paulweiss.com
roloughlin@paulweiss.com
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that a true and correct copy of Plaintiffs' Request for Clerk's Entry of Default Against William Ring was filed on July 24, 2023 through the CM/ECF system and that true and correct copies of this filing and supporting documents were sent by first-class mail, postage pre-paid, to the following:

William Ring c/o John Lenkey, Warden
Fayette County Prison
12 Court Street
Uniontown, PA 15401

and via email:

Bradley P. Marrs (VSB#25281)
Marrs & Henry
7202 Glen Forest Drive, Suite 307
Richmond, VA 23226
Tel. (804) 662-5716
Fax (804) 662-5712
bmarrs@marrs-henry.com

Glen K. Allen
Glen Allen Law (MD-NA)
5423 Springlake Way
Baltimore, MD 21212
Tel: (410) 802-6453
Glenallenlaw@protonmail.com

Counsel for Defendants

/s/ Michael R. Shebelskie

Michael R. Shebelskie
VSB No. 27459
HUNTON ANDREWS KURTH LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219-4074
Telephone: (804) 788-8200
Facsimile: (804) 788-8218
mshebelskie@HuntonAK.com

Counsel for Plaintiffs